

Malcolm A. Mackenzie, SBN 48278
Valerie E. Clemen, SBN 253849
Coombs & Dunlap, LLP
1211 Division Street
Napa, California 94559
Telephone: (707) 252-9100
Facsimile: (707) 252-8516

Attorneys for Claimant
Glenn Gary Baker

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case, No.
19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF VALERIE E.
CLEMEN IN SUPPORT OF CLAIMANT
GLENN GARY BAKER'S RESPONSE
TO REORGANIZED DEBTORS'
FORTY-FOURTH OMNIBUS
OBJECTION TO CLAIMS (NO
LIABILITY / PASSTHROUGH
CLAIMS)**

Response Deadline: December 1, 2020

**Hearing Information If Timely Response
Made:**

Date: December 15, 2020

Time: 10 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

I, Valerie E. Clemen, declare:

1. I am an attorney at law licensed to practice before all courts in the State of California, and am an attorney of record for Glenn Gary Baker, Claimant in the above-referenced action.
2. I received a letter dated February 17, 2020 from PG&E requesting additional support for claim number 69361, a true and correct copy of which is attached hereto as Exhibit A.

1 3. I contacted Reema Bains of PG&E via telephone March 12, 2020. I explained that my
2 client's claim consisted of claims from damage and losses from the October 2017 Northern
3 California fires, but also claims from damages and losses after the fire related to PG&E's tree
4 removal activities. I told Ms. Bains I was not sure if we needed to include documentation with our
5 response if part of the claim arose from the fires. Ms. Bains said that if the bulk of the losses were
6 from the fires, I should check "yes" in response to question 3 and return the form without the need
7 for supporting documentation.

8 4. Based on my discussion with Ms. Bains, I completed the form and emailed it to PG&E as
9 directed on March 16, 2020. A true and correct copy of my email is attached hereto as Exhibit B.

10 5. From July through October 2020, I exchanged several emails with Jill Pestka, Case
11 Manager, BROWNGREER PLC, the Claims Processor for the Fire Victim Trust, regarding my
12 client's claim number not being channeled to the Fire Victim Trust. I was therefore unable to upload
13 documentation in support of my client's claims.

14 6. On September 4, 2020, I reached out directly to Debtors Counsel Jane Kim via email
15 regarding my client's claims. A true and correct copy of my email is attached hereto as Exhibit C. I
16 received no response.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct. Executed at Napa, California, December 1, 2020.

19
20 

21 Valerie E. Clemen
22
23
24
25
26
27
28

EXHIBIT A



Pacific Gas and Electric Company
111 Stony Circle
Santa Rosa, CA 95401

February 17, 2020

Glenn Gary Baker
Coombs & Dunlap, LLP
Valerie E. Clemen 1211 Division Street
Napa, CA 94559

Additional Support Requested for Claim Number 69361

PG&E received the proof of claim form that you filed in its chapter 11 bankruptcy case. You are receiving this letter because you submitted a Standard Proof of Claim Form, and, based on the information provided and a review of PG&E's books and records, PG&E is unable to determine the basis for your claim.

In order to ensure that all valid claims receive timely and accurate distributions after the Bankruptcy Court has approved a chapter 11 plan of reorganization, we ask that you fill out the attached form to allow PG&E to further evaluate your claim. Please note that if your claim arises out of or relates to a Northern California wildfire then you do not need to provide any additional information other than your responses to Questions 1 through 3 in the attached.

Receiving this information within 14 days of your receipt of this letter will assist us greatly in processing your claim. Please return the form and any supporting documentation by one of the following methods:

If by email:	If by first class mail or hand delivery:
rtbt@pge.com	Reema Bains Pacific Gas and Electric Company 111 Stony Circle Santa Rosa, CA 95401

Only one form of submission is required. Please do not submit multiple forms.

If you are represented by an attorney, please forward this letter to your attorney.

If you have any questions, please feel free to call us at (707) 577-7055.

Yours truly,
Reema Bains
PG&E Corporation and Pacific Gas and Electric Company



1. Name: Glenn Gary Baker
2. Proof of Claim #: 69361
3. Did your claim arise out of a Northern California fire in 2015, 2017, or 2018? ☐ Yes / ☐ No
(check one)

If Yes, there is no need to fill out the rest of this form.

If No, please respond to the questions below.

4. What is the amount of your claim? \$ _____
5. Please provide the date and address of incident.
6. Please describe the nature of your claim (please include any supporting documentation if available):

Please note that providing a response to this letter does not mean that your claim will be allowed. PG&E will review the information you provide and reserves all its rights with respect thereto. If you have any questions about your proof of claim, you should consult an attorney.

EXHIBIT B

Valerie E. Clemen

From: Valerie E. Clemen
Sent: Monday, March 16, 2020 10:24 AM
To: 'rtbt@pge.com'
Subject: Claim No. 69361
Attachments: Claim 69361.pdf

Hello,

Please see attached form for claim number 69361 for Glenn Gary Baker.

Thank you,
Val

Valerie E. Clemen
Coombs & Dunlap, LLP
1211 Division Street
Napa, CA 94559
(707) 252-9100 - Main
(707) 252-8516 - Fax
vclemen@coombslaw.com

Privileged/Confidential Information may be contained in this message and any related attachments. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy, review, distribute or forward the contents of this message to anyone. In such case, you should delete this message from your computer and kindly notify the sender by reply e-mail. Please advise immediately if you or your employer do not consent to Internet e-mail for messages of this kind. Thank you.



1. Name: Glenn Gary Baker
2. Proof of Claim #: 69361
3. Did your claim arise out of a Northern California fire in 2015, 2017, or 2018? ☒ Yes / ☐ No (check one)

If Yes, there is no need to fill out the rest of this form.

If No, please respond to the questions below.

4. What is the amount of your claim? \$ _____
5. Please provide the date and address of incident.
6. Please describe the nature of your claim (please include any supporting documentation if available):

Please note that providing a response to this letter does not mean that your claim will be allowed. PG&E will review the information you provide and reserves all its rights with respect thereto. If you have any questions about your proof of claim, you should consult an attorney.

B19446245

EXHIBIT C

Valerie E. Clemen

From: Valerie E. Clemen
Sent: Friday, September 04, 2020 12:01 PM
To: 'jkim@kbkllp.com'
Subject: FW: In re PG&E Corporation, et al., Case No. 19-30088-DM, United States Bankruptcy Court for the Northern District of California (San Francisco Division)

Hi Jane,

My client (Glen Gary Baker) is on the list of persons with duplicate claims and I had a question about the objection that your office filed. Would you please call me when you have a chance?

Thank you,
Val

Valerie E. Clemen
Coombs & Dunlap, LLP
1211 Division Street
Napa, CA 94559
(707) 252-9100 - Main
(707) 252-8516 - Fax
vclemen@coombslaw.com

New Office Hours for Coombs & Dunlap, LLP: 8:00 a.m. to 5:00 p.m., Monday through Friday. Closed 12:00 p.m. to 1:00 p.m. for lunch.

Privileged/Confidential Information may be contained in this message and any related attachments. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy, review, distribute or forward the contents of this message to anyone. In such case, you should delete this message from your computer and kindly notify the sender by reply e-mail. Please advise immediately if you or your employer do not consent to Internet e-mail for messages of this kind. Thank you.

From: Vignali, Andrew [<mailto:avignali@primeclerk.com>]
Sent: Friday, August 14, 2020 2:40 PM
To: PGE Team
Subject: In re PG&E Corporation, et al., Case No. 19-30088-DM, United States Bankruptcy Court for the Northern District of California (San Francisco Division)

Please find below links to the following important documents recently filed in the bankruptcy proceedings of PG&E Corporation, Case No. 19-30088-DM, United States Bankruptcy Court for the Northern District of California (San Francisco Division):

- [Reorganized Debtor's Fifth Omnibus Objection to Claims \(Duplicate Claims\) \(Related Document: 8228\)](#) [Docket No. 8759]
- [Notice of Hearing on Reorganized Debtors Fifth Omnibus Objection to Claims \(Duplicate Claims\) \(Related Documents: 8228, 8759\). Hearing scheduled for 9/22/2020 at 10:00 a.m. \(PT\)](#) [Docket No. 8760]

For additional information, and to download all documents filed in the Debtors' chapter 11 cases free of charge, please visit <https://restructuring.primeclerk.com/pge>.

Quality. Partnership. Expertise. Innovation.

For more information click here: <https://www.primeclerk.com/why-choose-us>



For Prime Clerk's email disclaimer, please click here: <http://primeclerk.com/email-disclaimer/>